

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MARYLAND  
Baltimore

IN RE:

ANGELA MCLEOD-COOPER, A/K/A  
ANGELA MCLEOD, A/K/A ANGELA COOPER

Chapter 13

Debtor(s)

Case No. 10-13456

OBJECTION OF Deutsche Bank National Trust Company, as Trustee for Long Beach Mortgage  
Loan Trust 2006-9  
TO PROPOSED CHAPTER 13 PLAN AND  
CONFIRMATION THEREOF

Deutsche Bank National Trust Company, as Trustee for Long Beach Mortgage Loan Trust 2006-9 and its assignees and/or successors in interest, a secured creditor in the above-entitled Bankruptcy proceeding, hereby submits the following objections to the Confirmation of the Chapter 13 Plan proposed by the Debtor(s):

1. This objecting secured creditor is the beneficiary of a trust deed on property commonly known as 328 S. POPPLETON STREET, Baltimore, MD 21230; the promissory note and deed of trust were attached to the proof of claim filed by the secured creditor.
2. The debtor(s) are due a total pre-petition arrears of \$42,231.34, comprised of 22 monthly payments of \$1,538.15; accrued late charges of \$1,383.48; NSF check charge(s) of \$25.00; BPO Fee of \$100.00; escrow shortage of \$4,672.89; previous bankruptcy fees & costs of \$797.17; and previous foreclosure fees & costs of \$1,413.50.
3. The proposed Chapter 13 plan does not provide this objecting Secured Creditor with adequate protection or adequate security, according to Sections 362 and 1325 (a) of the Code.
4. The plan does not propose to pay the Secured Creditor's entire claim as shown in its proof of claim, in that the arrears are not listed and this Creditor's claim was filed in the amount of \$42,231.34.

CONCLUSION

Any Chapter 13 Plan proposed by the Debtor(s) must provide for and eliminate the objections specified above in order to be feasible and to provide adequate protection to this objecting secured creditor. It is respectfully requested that confirmation of the Chapter 13 Plan as proposed by the Debtor(s) be denied.

WHEREFORE, secured creditor prays as follows:

1. That confirmation of the proposed Chapter 13 Plan be denied.
2. For attorney's fees and costs incurred herein.
3. For dismissal of the Chapter 13 proceeding.
4. For such other relief as this Court deems proper.

Dated: 4/20/10

Respectfully submitted  
JPMorgan Chase Bank, National Association

By Counsel:

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CERTIFICATE OF SERVICE

I certify that I have mailed true copies of the above mentioned Objection to the Chapter 13 Plan, by electronic or first class mail, postage pre-paid on the 20th day of April, 2010 to the following:

ANGELA MCLEOD-COOPER  
AKA ANGELA MCLEOD  
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Debtor(s)

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Debtor's Attorney

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